

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JOHN AND JANE DOE NO. 1, et al.,	:	CASE NO. 3:22-cv-00337
	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL DISTRICT BOARD OF EDUCATION, et al.,	:	
	:	
Defendants.	:	

DECLARATION OF [FATHER OF STUDENT WITNESS NO. 2]

I, Father of Student Witness No. 2, declare:

1. My name is Father of Student Witness No. 2. I am the father of Student Witness No. 2.
2. I am over the age of 21 and fully competent to make this declaration.
3. At this time, I am not a plaintiff in this lawsuit.
4. I have personal knowledge of all of the facts stated in this declaration, and my statements in this declaration are true and accurate to the best of my knowledge, information, and belief.

5. Attached as Exhibit A is a true and correct copy of the declaration of my daughter Student Witness No. 2 regarding the bathroom incident on January 12, 2023.

6. My daughter's declaration in Exhibit A is the same thing she told me on January 12, 2023 when the incident happened.

7. I am not a particularly religious person. Nor am I a particularly political person.

8. But, as a father, I am very upset.

9. It violated my daughter's privacy and safety when the Bethel Local School District placed her in this situation.

10. I cannot put into words, as a father, how much anger and pain this has caused me.

11. The school bathroom is supposed to be a safe place for my daughters. Now, they have to look over their shoulder and I can't be there to protect them. The school is responsible for my daughter's safety while she is there. The school is failing to protect my daughter.

I declare under penalty of perjury that the foregoing is true and correct.

2/3/23
Date

Father of Student Witness
Father of Student Witness No. 2 *No. 2*

EXHIBIT A

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JOHN AND JANE DOE NO. 1, et al.,	:	CASE NO. 3:22-cv-00337
	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL DISTRICT BOARD OF EDUCATION, et al.,	:	
	:	
Defendants.	:	

DECLARATION OF STUDENT WITNESS NO. 2

I, Student Witness No. 2, declare:

1. My name is Student Witness No. 2.
2. I am 15 years old and a tenth grade student at Bethel Local Schools.
3. I am a girl.
4. At this time, I am not a plaintiff in the current lawsuit.
5. I have personal knowledge of all of the facts stated in this declaration, and my statements in this declaration are true and accurate to the best of my knowledge, information, and belief.
6. Around lunch time on January 12, 2023, I was in the girls' communal restroom by the cafeteria in the high school.

7. I was in the restroom with several other girls.

8. While I was in the restroom, I saw Anne Roe enter a bathroom stall that was already occupied by a female student.

9. They were in the stall together for a few minutes.

10. He was standing facing her and she was sitting down with her feet facing out.

11. I heard sucking noises as if someone were sucking on a lollipop.

12. It was my clear impression that they were engaged in oral sex.

13. It was deeply troubling to me. And I felt violated in a private space where I no longer feel safe.

14. I am deeply uncomfortable sharing a communal restroom with a biological male.

15. I now avoid using the restroom by the cafeteria during lunchtime.

16. Since the incident on January 12, 2023, I have seen the same two students go into the cafeteria bathroom and into a single bathroom stall on at least a weekly basis. When I have witnessed this, they are clearly facing each other in the bathroom stall, and I have heard sucking noises. It is my clear impression that they are engaging in oral sex at these times.

17. When I witnessed this occurring, I reported it to a teacher.

18. To my knowledge, the school has not taken any disciplinary action against either of the students.

I declare under penalty of perjury that the foregoing is true and correct.

2/3/23
Date

Student Witness NO. 2
Student Witness No. 2